

Health Care Finance and Administration	Section: General Administrative Procedures and Compliance
Policy Manual Number: 200.035	Subject: Verification

## VERIFICATION

**Legal Authority:** 42 CFR 435.945; 42 CFR 435.948; 42 CFR 435.949; 42 CFR 435.952; 42 CFR 435.956; 42 CFR 457.380; 42 CFR 435.1101; 42 CFR 435.1102; 42 CFR 435.1103

### 1. Overview

The Affordable Care Act of 2010 reformed the verification processes used to determine eligibility for TennCare Medicaid and CoverKids. To support a streamlined application process, state Medicaid agencies must use electronic data sources, if available, to verify information provided by an individual. If an electronic data source is not available or there are discrepancies between the information provided by the individual and the information obtained via an electronic database, the state may request additional verification.

### 2. Policy Statement

Verification is the process of confirming or substantiating information provided by an individual. Non-financial and financial information must be verified and documented for all TennCare Medicaid and CoverKids individuals.

Providing requested information is the responsibility of the applying individual. However, HCFA is required to verify information provided by the individual using electronic data sources and interfaces, whenever possible. If information related to eligibility for TennCare Medicaid is available through an electronic service, HCFA must use the information available prior to requesting additional information or documentation from the individual.

HCFA will follow the verification procedures for TennCare Medicaid and CoverKids as established in HCFA's Verification Plan.

Note: Self-attestation is accepted for presumptive categories regarding citizenship, residency, and enumeration.

### 3. The Federal Data Services Hub

The Federal Data Services Hub (the Hub) is an electronic service established by the U.S. Department of Health and Human Services (HHS) to facilitate sharing of data and other information between federal agencies, state agencies, and other entities involved in administering Insurance Affordability Programs (IAPs). The following eligibility information is available through the Hub:

- Social Security Administration (SSA): Social Security Number (SSN), citizenship, age and date of birth verification;
- Department of Treasury, Internal Revenue Service: Income verification; and
- Department of Homeland Security (DHS): Immigration status verification.

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HCFA will use eligibility-related information received through the Hub, when available. All applications filed with the FFM are matched with Hub data.

#### **4. Use of Electronic Data and Requesting Additional Information**

Information provided by an individual at application is verified with the Hub. Individuals are not required to provide additional documentation when the information is available for verification from the Hub, as long as the information provided by the individual is reasonably compatible with the Hub. See the *Reasonable Compatibility and Verification* policy for further explanation of reasonable compatibility.

Individuals must submit additional information or documentation when information is not reasonably compatible. Individuals have 10 days to provide additional documentation when requested. Information determined not reasonably compatible is not used to deny or terminate eligibility without first requesting additional information. If requested additional information is not received within 10 days, a denial or termination notice is sent to the individual for failure to respond to the request for documentation.

#### **5. Documentary Evidence**

If documentary evidence must be used to verify an individual's statement, document case notes with the date received, why it was requested and other relevant information.

##### **a. Official Evidence**

Official documentation are those prescribed or recognized as authorized, and are most commonly provided by businesses, agencies, and organizations engaged in specific enterprises or service delivery. A Social Security card, utility bill and award letter are examples of official documents.

##### **b. Unofficial Evidence**

Unofficial documentary evidence may include such items as notes from an employer, an estimate from a real estate agent, etc.

#### **6. Collateral Contact**

A collateral contact is a verbal confirmation of the individual's attestation by an individual outside of the home who is knowledgeable of the individual's circumstances. Contact may be made in writing or by telephone.

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If a collateral contact must be used, document the date of contact, mode of contact, the name of the collateral contact, relationship of the contact to the individual, and content of the conversation or letter in the case notes.

## 7. Non-Financial Eligibility Conditions

NOTE: The list below provides an overview of the verification requirement for each eligibility condition. Additional information about verification requirements can be found in the relevant policy chapters.

### a. Age

HCFA accepts self-attestation of age. SSA data is used to verify age when there is reason to believe the attested age is incorrect. If HCFA is unable to electronically verify age then documentary evidence is requested.

### b. Citizenship and Immigration Status

Federal law requires HCFA to use SSA and DHS data to verify citizenship and immigration status. If verification is unavailable through the Hub, documentary evidence is requested.

### c. Death

Verification can either be obtained electronically through Vital Statistics or SOLQ, or with a hard copy of the obituary or death certificate.

### d. Disability

SSA electronic data is used to verify that an SSA disability determination has been made.

### e. Health Insurance Information

HCFA accepts self-attestation of other health insurance information. If paper documentation is necessary, obtain a copy of the individual health insurance card.

### f. Household Composition

HCFA accepts self-attestation of household composition. HCFA will use the Public Assistance Reporting Information System (PARIS) data to identify individuals receiving benefits in another state, in order to identify children claimed by non-custodial parents. Paper documentation may be requested if necessary.

### g. Identity

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If HCFA is given a reason to doubt an individual's identity, SSA data obtained via the Hub that verifies citizenship and immigration status can also be used to verify identity. If paper documentation must be requested, accept a State driver's license, school identification card with a photograph, a U.S. Military card, etc. See the *Citizenship and Immigration* policy.

#### **h. Medicare Eligibility**

SSA is used to verify Medicare eligibility. If paper documentation is necessary, obtain a copy of the Medicare card, Medicare Explanation of Benefits (EOB), Medicare Advantage enrollment card, etc.

#### **i. Parent/Caretaker Relative Status**

HCFA accepts self-attestation of parent and caretaker relative status. If there is a discrepancy in information provided by multiple caretakers of a child, paper document may be requested if necessary.

#### **j. Pregnancy**

HCFA accepts self-attestation of pregnancy as required by federal law.

#### **k. Residence**

HCFA accepts self-attestation of residency. If HCFA is given a reason to doubt the individual's residence, HCFA can conduct post-eligibility verification of state residency using PARIS data, or request paper documentation.

#### **l. SSN**

SSNs are verified by the SSA via the Hub. If no electronic data match is available, request a copy of the individual's SSN card or a copy of the SS-5 Application for SSN.

### **8. Financial Information**

Financial information from the Hub will be used for verification when available. The individual's SSN, when available, is used for financial verification.

#### **a. Income**

The FFM will apply a reasonable compatibility standard to attested income data and income information obtained via the Hub. Income data is obtained from the SSA, the IRS and the Work Number/Equifax.

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If additional information must be requested, accept pay stubs, employer statements, tax records, etc. Document in case notes what type of documentation is used.

**b. Resources**

Resources are not verified through the Hub. Verification of resources may include bank statements, stock certificates, titles, contracts; information received from knowledgeable sources (real property). Document in case notes what type of document was used for verification. Allow up to 10 days for individuals to provide verification of resources.

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